

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

06 CR 10169 PBS

UNITED STATES OF AMERICA)	CRIMINAL NO.
)	
V.)	VIOLATIONS:
)	18 U.S.C. § 844(i)
PAUL F. MARE,)	(Attempted Arson)
)	18 U.S.C. § 1341
Defendant.)	(Mail Fraud)
)	18 U.S.C. § 844(h)(1)
)	(Use of Fire to Commit a Felony)

INDICTMENT

COUNT ONE: (18 U.S.C. § 844(i) -- Attempted Arson)

The Grand Jury charges that:

On or about May 7, 2005, at Boston, in the District of
Massachusetts,

PAUL F. MARE,

defendant herein, did attempt to damage or destroy, by means of
fire, a building used in interstate or foreign commerce and in
activities affecting interstate or foreign commerce, to wit:
Salon Mare, Inc., a beauty salon, located in a commercial
building at 42 Bromfield Street, Boston, Massachusetts, and its
contents.

All in violation of Title 18, United States Code, Section
844(i).

COUNTS TWO THROUGH FIVE: (18 U.S.C. § 1341 -- Mail Fraud)

Between in or about May, 2005, to in or about January, 2006,
in the District of Massachusetts,

PAUL F. MARE,

defendant herein, did knowingly and willfully devise and execute
a scheme and artifice to defraud and for obtaining money and
property by means of false and fraudulent pretenses,
representations and promises, which scheme and artifice is
further described in the following paragraphs.

General Allegations

1. On or about August 1, 1998, Paul F. Mare ("the
defendant") leased commercial space at 42 Bromfield Street,
Boston, Massachusetts. The defendant thereafter opened a beauty
salon business located at this address, which he owned and
operated, called Salon Mare, Inc.

2. On July 29, 2002, the Norfolk & Dedham Mutual Fire
Insurance Company of Dedham, Massachusetts, issued an insurance
policy, number R0207068, for the defendant's business, Salon
Mare, Inc., listing the defendant as the insured. The defendant
purchased this policy through an agent, Cooke & Currie Insurance,
LTD, of Boston, Massachusetts. The policy, which was for a
one-year term, provided coverage of up to \$50,000 for business
personal property, \$50,000 fire liability, \$1,000,000 business
liability coverage, and 12 months loss of income coverage.

3. On July 29, 2003, the defendant, d/b/a Salon Mare, Inc., renewed the above aforementioned insurance policy, number R0311537, for a one-year term through Cooke & Currie Insurance, LTD.

4. On July 29, 2004, the defendant, d/b/a Salon Mare, Inc., renewed the above aforementioned insurance policy, number R0311537, for another one-year term through Cooke & Currie Insurance, LTD. With inflation adjustment, the business personal property coverage rose to \$53,500.

5. On May 7, 2005, a fire of incendiary origin occurred at Salon Mare, Inc., located at 42 Bromfield Street, Boston, Massachusetts.

6. On or about May 13, 2005, the Norfolk & Dedham Mutual Fire Insurance Company hired T/M Seger Claim Service, Inc., of Duxbury, Massachusetts, as part of the insurance claim process, to investigate and adjust the Salon Mare, Inc., fire.

The Scheme to Defraud

7. It was part of the scheme and artifice to cause or attempt to cause the destruction of the defendant's business, Salon Mare, Inc., by means of fire.

8. It was further part of the scheme and artifice that the defendant would and did cause the submission of a false and fraudulent claim for personal property/business contents loss insurance proceeds to the Norfolk & Dedham Mutual Fire Insurance

Company.

9. On or about the dates listed below, in the District of Massachusetts,

PAUL F. MARE,

defendant herein, for the purpose of executing the aforesaid scheme and artifice to defraud and for obtaining money and property by false and fraudulent pretenses, representations and promises, did cause to be placed in authorized depositories for mail matter, the identified item to be sent and delivered by the United States Postal Service, and did knowingly cause such item to be delivered by the United States Postal Service, according to the directions thereon, as follows:

<u>COUNT</u>	<u>DATE</u>	<u>MAILING</u>
TWO	5/23/05	Letter relative to the investigation and claim adjustment for the fire at Salon Mare, Inc., on 5/7/05 (Norfolk & Dedham Mutual Fire Insurance Company Policy No. R0311537, Claim No. P0521806), mailed from T/M Seger Claim Service, Inc., to Lorraine A. Peirce, AIC, Senior Property Loss Examiner of the Norfolk & Dedham Mutual Fire Insurance Company at 222 Ames Street, P.O. Box 9109, Dedham, MA.
THREE	5/31/05	Letter relative to the investigation and claim adjustment for the fire at Salon Mare, Inc., on 5/7/05 (Norfolk & Dedham Mutual Fire Insurance Company Policy No. R0311537, Claim No. P0521806), mailed from T/M Seger Claim Service, Inc., to Lorraine A. Peirce, AIC, Senior Property Loss Examiner of the Norfolk & Dedham Mutual Fire Insurance Company at 222 Ames Street, P.O. Box 9109, Dedham, MA.

- FOUR 6/10/05 Letter relative to the investigation and claim adjustment for the fire at Salon Mare, Inc., on 5/7/05 (Norfolk & Dedham Mutual Fire Insurance Company Policy No. R0311537, Claim No. P0521806), mailed from T/M Seger Claim Services, Inc., to Lorraine A. Peirce, AIC, Senior Property Loss Examiner of the Norfolk & Dedham Mutual Fire Insurance Company at 222 Ames Street, P.O. Box 9109, Dedham, MA.
- FIVE 1/13/06 Letter, enclosing an invoice bill and letter, dated 12/29/05, addressed to Salon Mare and Paul Mare from Donna Whitlow, Account Specialist for ServiceMaster By Gilmore Brothers of Framingham, Massachusetts, regarding restoration services rendered at Salon Mare, Inc., following the fire that occurred at that location on May 7, 2005, mailed from Skelly Insurance Agency of Boston, Massachusetts, to Salon Mare, Inc., and Paul Mare, at 42 Bromfield Street, Boston, MA.

All in violation of Title 18, United States Code, Section 1341.

COUNT SIX: (18 U.S.C. § 844(h)(1) -- Use of Fire to
Commit a Felony)

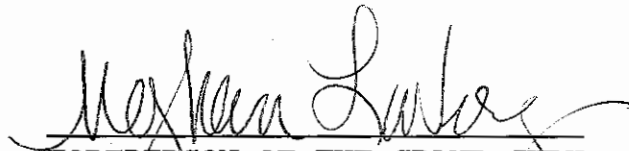
On or about May 7, 2005, at Boston, in the District of
Massachusetts,

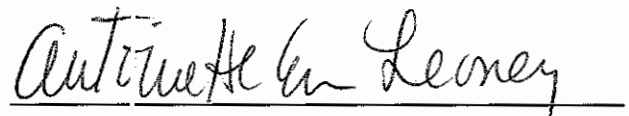
PAUL F. MARE,

defendant herein, did knowingly use fire to commit a felony
prosecutable in a court of the United States, to wit: Mail
Fraud, in violation of Title 18, United States Code, Section
1341, as charged in Counts Two through Five of this Indictment.

All in violation of Title 18, United States Code, Section
844(h)(1).

A TRUE BILL

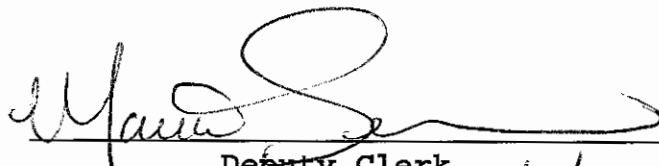

FOREPERSON OF THE GRAND JURY


ANTOINETTE E.M. LEONEY
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS

June 7, 2006

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk
6/7/06
3:07
MS

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency ATF

City Boston Related Case Information:

County Suffolk Superseding Ind./ Inf. _____ Case No. _____
 Same Defendant _____ New Defendant _____
 Magistrate Judge Case Number _____
 Search Warrant Case Number _____
 R 20/R 40 from District of _____

Defendant Information:

Defendant Name PAUL F. MARE Juvenile ☐ Yes ☒ No

Alias Name _____

Address 93 East Brookline Street, Apt. #2, Boston, MA 02108

Birth date (Year only): 1963 SSN (last 4 #): 9844 Sex M Race: Caucasian Nationality: U.S.

Defense Counsel if known: Elliot Weinstein, Esq. Address: 228 Lewis Wharf
Boston, MA 02110

Bar Number: _____

U.S. Attorney Information:

AUSA Antoinette E.M. Leoney Bar Number if applicable 545567

Interpreter: ☐ Yes ☒ No List language and/or dialect: _____

Victims: ☐ Yes ☒ No If Yes, are there multiple crime victims under 18 U.S.C. §3771(d)(2) ☐ Yes ☒ No

Matter to be SEALED: ☒ Yes ☐ No

☒ Warrant Requested ☐ Regular Process ☐ In Custody

Location Status:

Arrest Date: _____

☐ Already in Federal Custody as _____ in _____
☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial
☐ On Pretrial Release: Ordered by _____ on _____

Charging Document: ☐ Complaint ☐ Information ☒ Indictment

Total # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 6

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☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: June 7, 2006 Signature of AUSA: Antoinette E.M. Leoney

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District Court Case Number (To be filled in by deputy clerk):

Name of Defendant PAUL F. MARE

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	18 U.S.C. §844(i)	Attempted Arson	1
Set 2	18 U.S.C. §1341	Mail Fraud	2 - 5
Set 3	18 U.S.C. §844(h)(1)	Use of Fire to Commit a Felony	6
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Set 14			
Set 15			

ADDITIONAL INFORMATION: